



## **PROGRAM GUIDANCE**

Rhode Island Department of Education  
Office of Statewide Efficiencies  
Child Nutrition Programs

Serving CACFP Meals During Novel Coronavirus			
<b>Program:</b> CACFP	<b>Date Approved:</b> 3/26/20	<b>Approved by:</b> William Trimble	<b>Date Reviewed/Revised:</b> 3/26/2020 <b>Date Distributed:</b> 3/26/2020
<p><b>PURPOSE:</b></p> <p>Per local and national guidance, social distancing is necessary to avoid the spread of the novel coronavirus, which means that child and adult care facilities cannot operate under normal circumstances but many families will still need to rely on center-provided meals in order to provide participants with the food that they need. The USDA has released several flexibilities related to the service of Child and Adult Food Program (CACFP) meals during this unprecedented time. The following guidance applies to all Child and Adult Care Food Program Sponsors, unless otherwise specified, and is intended to help Sponsors plan for the following scenarios:</p> <ul style="list-style-type: none"><li>• Community Meal Options for Families</li><li>• Serving CACFP Meals When the Center is Closed</li><li>• Serving CACFP Meals When the Center is Open and Operating Under Stricter DHS Guidance</li><li>• SFA Sponsors of the At-Risk Afterschool Meals Program</li><li>• Issues Following the CACFP Meal Pattern due to Supply Chain Disruptions</li><li>• Adult Meal and Other Meals Outside of the Federally Funded Child Nutrition Programs</li></ul>			
<p><b>Community Meal Options for Families</b></p> <p>Although many child care centers are currently closed due to COVID-19 concerns and children are therefore not receiving regular meals through your programming, many communities have made alternate food service arrangements available that any child age 18 or under can access. As your center decides whether or not to continue providing meals during center closure, in accordance with the guidance found in this document, please consider alternate meal site options that may be available in your community. A complete list of current meal service sites can be found on the Department of Health (DOH) website, found here: <a href="https://health.ri.gov/diseases/ncov2019/about/foodsites/">https://health.ri.gov/diseases/ncov2019/about/foodsites/</a> Information on available meal service sites can also be found by calling the United Way at 211. Regardless of whether your center decides to offer meals during periods of closure, please share this information with your participants and their families as these sites will provide the most flexibility in terms of meal service. Meals can be provided to any child age 18 or under with no enrollment or other paperwork requirements at these meal service sites and many of these sites are also offering weekend meals.</p> <p><b>Serving CACFP Meals When the Center is Closed</b></p> <p>Under normal circumstances, when a child care or adult day care center or CACFP At-Risk Program is not in session and the center does not consider the day to be an “operational day,” the CACFP may not operate. However, USDA</p>			

issued a nationwide non-congregate feeding waiver on March 20, 2020 to allow child and adult day care centers who are closed to continue to provide meals and snack to participants under the CACFP. USDA has further waived the requirement that enrichment activities take place in the At-Risk After School Meals Program during this time period.

To use CACFP during a center closure, the institution must have an approved CACFP agreement and application on file with RIDE. If you currently participate in the CACFP, you already have an approved CACFP program and application on file.

Institutions participating in CACFP who wish to take advantage of the non-congregate feeding waiver must receive approval from RIDE prior to starting meal service. Non-congregate meal service means that your participants do not need to remain on site to consume meals that will be claimed under the CACFP and we will also consider the approval of centers that wish to distribute multiple meals (i.e. breakfast and lunch) at one time. In order to participate in a non-congregate meal service, please be reminded of the following requirements:

- Centers may serve only the approved meal types included in their CACFP agreement in CNP connect
- Participants may be served no more than 2 meals and 1 snack per day
- Meals may only be served to participants enrolled in your child care, adult care, or at-risk program
- A parent or guardian may pick up a meal on behalf of an enrolled participant but meals served must be tracked by participant
- All meals must be documented and must meet CACFP meal pattern requirements unless the center has been approved for a meal pattern waiver, as described further in this guidance
- All meals and snacks must be unitized. A unitized meal or snack must include all of the required components for the meal type in the minimum quantities specified by the meal pattern. This includes both milk and/or infant formula, as appropriate.
- The Sponsor must take appropriate measures to ensure the safety of meals that will be removed from the site for later consumption. This could include labeling perishable items with an expiration date and/or refrigeration instructions. Centers will not be approved to serve hot meals in a non-congregate feeding model.
- Meal counts must be taken at the point of service and must be maintained by participant, by meal period for each meal served
- For the purposes of claims for reimbursement, meal counts can be used to report attendance and centers must continue to report enrollment by eligibility category (free/reduced/paid) based on those participants in attendance during the month
- Sponsors must follow the Rhode Island Food Code and any additional requirements implemented by the RI Department of Health to limit the spread of disease.
- The USDA “And Justice For All” poster must be displayed at your meal service location.

## **Serving CACFP Meals When the Center is Open and Operating Under Stricter DHS Guidelines**

While Governor Raimondo has advised child care centers to close during this time of national health crisis, we understand that there is still a high demand for child care services and that many centers would like to continue to operate during the coronavirus 2019 (COVID\_19) pandemic. On March 24, 2020 Governor Raimondo and the RI Department of Human Service issued emergency regulations to provide further guidance for these child care programs wishing to remain open. Those who chose to continue to operate must follow the enhanced regulatory requirement, which can be found on the DHS website here:

<http://www.dhs.ri.gov/Programs/CCAPProviderResourceNewPageLAC.php>

In addition to these enhanced regulations, DHS also issued a Q&A document that includes the following statements: “Have parent pack lunches and snacks, try to have kids not share their food, avoid shared or “family style” meals and snacks.” We have been in contact with DHS and have clarified that this statement is intended as *guidance* and does not constitute a regulation, meaning that centers may continue to provide meals under the CACFP if they choose to remain open, however, centers should not be implementing family style meal service and should be taking all available precautions to limit the number of people that come in contact with food served to children in your care.

### **SFA Sponsors of the At-Risk Afterschool Meals Program**

As stated above, in addition to waiving the congregate feeding requirement for the CACFP the USDA has also waived the requirement that educational or enrichment activities take place during the At-Risk Afterschool Meals Program during this time period. This means that School Food Authority (SFA) Sponsors of the At-Risk Afterschool Meals Program who are already implementing the Summer Food Service Program (SFSP) during unanticipated school closures could continue to offer an additional meal and/or snack in the At-Risk Afterschool Meals Program, as long as the same meals are not served in both programs.

### **Issues Following the CACFP Meal Pattern Due to Supply Chain Disruptions**

While it is important to make every effort to ensure that participants are receiving complete meals that provide essential nutrients, in line with the Dietary Guidelines for Americans (DGA), the USDA recognizes that, in this public health emergency, appropriate flexibilities may be necessary.

If you are unable to serve meals that meet the CACFP meal pattern requirements, you must contact RIDE and request a waiver in order to be able to claim these meals for reimbursement. Your request must specify the meal pattern requirements that cannot be met and must be justified based upon disruptions to the availability of food products resulting from unprecedented impacts of COVID-19. RIDE expects Program operators to maintain and meet the nutrition standards for the CACFP to the greatest extent possible. If a meal pattern waiver is granted by RIDE, Sponsors must continue to document all meals served in accordance with regular program requirements.

### **Adult Meals and Other Meals Outside of Federal Child Nutrition Programs**

If you choose to serve meals outside of the CACFP (i.e. additional meal periods not approved, adult meals, meals for non-enrolled siblings, etc.), your program may sell meals and consider it “catering.” In order to do this, you must establish a non-program meal price that fully covers the cost to produce that meal. You can either charge individuals for the meal, or you can see if a community organization or other source of funds is available to pay for

the meals. Non-profit food service account funds may not be used to cover the cost of non-program meals. You must keep adequate records of all non-program meals served and the funds used to pay for these meals.

### **Primary RIDE Child and Adult Care Food Program Contacts**

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### **References:**

Part 226 – Child and Adult Care Food Program

COVID-19: Child Nutrition Response #1 – Nationwide Waiver to Allow Meal Service Time Flexibility in the CNPs

COVID-19: Child Nutrition Response #2 – Nationwide Waiver to Allow Non-congregate Feeding in the CNPs

COVID-19: Child Nutrition Response #3 – Nationwide Waiver of the Activity Requirement in the Afterschool Care CNPs

COVID-19: Child Nutrition Response #4 – Nationwide Waiver to Allow Meal Pattern Flexibility in the CNPs

COVID-19: Child Nutrition Response #5 – Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children